

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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Chapter 11

In re

Case No.09-50026(reg)
(Jointly Administered)

MOTORS LIQUIDATION COMPANY, ET AL
f/k/a General Motors Corp. *et al.*

Debtor.

**NOTICE OF APPEARANCE AND
DEMAND FOR SERVICE OF PAPERS**

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PLEASE TAKE NOTICE, that USAA, by its attorneys Certilman Balin Adler & Hyman, LLP, appears herein as a creditor and demands, pursuant to Rules 2001(a), 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure and Sections 102(1), 303(g), 342 and 1109(b) of the Bankruptcy Code, that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon the undersigned at the following office address and telephone number:

CERTILMAN BALIN ADLER & HYMAN, LLP
90 Merrick Avenue, 9th Floor
East Meadow, New York 11554
(516) 296-7000
Attention: Richard J. McCord, Esq.
rmccord@certilmanbalin.com
Carol A. Glick, Esq.
cglick@certilmanbalin.com

PLEASE TAKE FURTHER NOTICE, that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise which may affect or seek to affect in any way any rights

or interests of USAA, with respect to the debtors' property or proceeds thereof in which the debtors may claim an interest.

PLEASE TAKE FURTHER NOTICE THAT neither this **Notice of Appearance and Demand for Service of Papers** (the "Notice"), nor any later appearance, pleading, proof of claim or suit, shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding relating to this case; (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; (v) an election of remedy; and (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: East Meadow, New York
May 17, 2011

CERTILMAN BALIN ADLER & HYMAN, LLP
Attorneys for USAA

By: /s/Richard J. McCord
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